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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH VERNON GRUBBS,

Defendant.

NO. MJ16-327

COMPLAINT for VIOLATION

18 U.S.C. §§ 2252(a)(2)

BEFORE, the Honorable Brian A. Tsuchida, United States Magistrate Judge, U. S.  
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Receipt of Child Pornography)**

Beginning on a date unknown but not later than in or about 2012 and continuing  
until at least in or about December 2015, at Camano Island and Stanwood, within the  
Western District of Washington, and elsewhere, JOSEPH VERNON GRUBBS did  
knowingly receive, and attempt to receive, visual depictions the production of which  
involved the use of minors engaging in sexually explicit conduct, and the visual  
depictions were of such conduct, using any means and facility of interstate and foreign

1 commerce and which images had been mailed and shipped and transported in and  
2 affecting interstate and foreign commerce by any means, including by computer.

3 All in violation of Title 18, United States Code, Sections 2252(a)(2) and  
4 2252(b)(1).

5 And the Complainant states that this Complaint is based on the following  
6 information:

7 I, Matthew Murray, being first duly sworn on oath, depose and say:

8 **I. INTRODUCTION**

9 1. I am a Special Agent (SA) with the Federal Bureau of Investigation  
10 assigned to the Everett, Washington Resident Agency, Seattle, Washington field office. I  
11 am an investigative and law enforcement officer of the United States within the meaning  
12 of Title 18, United States Code, Section 2510(7). My duties as a Special Agent include  
13 the full time investigation of a wide range of federal criminal offenses, including  
14 investigations involving child exploitation violations pertaining to the illegal production,  
15 distribution, receipt, and possession of child pornography and material involving the  
16 sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252(a), and 2252A(a).  
17 I have participated in the execution of previous search warrants which involved child  
18 exploitation and/or child pornography offenses and the search and seizure of computers  
19 and other digital devices. I have also had the opportunity to review examples of child  
20 pornography as defined by 18 U.S.C. § 2256.

21 2. As detailed below, based on my investigation and the investigation of other  
22 law enforcement officers, I submit there is probable cause to believe that JOSEPH  
23 VERNON GRUBBS has committed the violations described above. In particular, the  
24 investigation has uncovered substantial evidence that JOSEPH VERNON GRUBBS  
25 received and attempted to receive child pornography between 2012 and 2015, and  
26 possessed child pornography on or before July 27, 2016.

27 3. The facts set forth in this Complaint are based on my own personal  
28 knowledge; knowledge obtained from other individuals during my participation in this

1 investigation, including other law enforcement officers; interviews of cooperating  
2 witnesses; review of documents and records related to this investigation; communications  
3 with others who have personal knowledge of the events and circumstances described  
4 herein; and information gained through my training and experience.

5 4. Because this Complaint is submitted for the limited purpose of establishing  
6 probable cause, it does not set forth each and every fact that I or others have learned  
7 during the course of this investigation. I have set forth only the facts that I believe are  
8 relevant to the determination of probable cause to believe that JOSEPH VERNON  
9 GRUBBS committed the offenses charged in this Complaint.

## 10 II. PROBABLE CAUSE

11 5. In late 2014, FBI received information from Yahoo's Electronic Crimes  
12 Investigative Team (ECIT), which focuses on identifying and documenting instances in  
13 which Yahoo's services are used in violation of Yahoo's Terms of Use, that several  
14 Yahoo users from the Philippines were using Yahoo services to produce and sell child  
15 pornography and/or live-stream webcam shows of minors engaging in sexually explicit  
16 conduct to other Yahoo users around the world.

17 6. Among the accounts identified by Yahoo's ECIT was  
18 joe\_rose88@yahoo.com. In December 2015, Yahoo submitted Cybertip 744111 to the  
19 National Center for Missing and Exploited Children (NCMEC), which NCMEC then  
20 shared with the FBI. According to the Cybertip, someone using email account  
21 tatgirl\_mar@yahoo.com sent an email with the subject line "FW: 10yrs old." to  
22 joe\_rose88@yahoo.com on June 15, 2015. Attached to this email were nineteen images  
23 depicting a nude and/or semi-nude prepubescent girl ("CV") posed in a sexually  
24 suggestive manner. I have reviewed each of these images, all of which depict CV. In  
25 each photo, she is posed in a way that emphasizes her genitals. Based on her size, lack of  
26 breast development, and lack of pubic or body hair, I believe CV is between ten and  
27 twelve years old.  
28

1           7.       There are several images that show CV lying on her back with her legs  
2 spread apart while spreading her labia with her hands to more fully expose her genitals to  
3 the camera. In other images, CV is shown standing or kneeling while spreading her  
4 buttocks apart and exposing her anus and vagina. The remaining images show CV  
5 standing and removing her underwear. In each photo, it appears that CV was being  
6 directed to assume specific poses.

7           8.       Based on subscriber and IP connection information provided by Yahoo and  
8 follow-up investigation, I identified an individual named JOSEPH VERNON GRUBBS  
9 with associated addresses in Stanwood, Washington, whom I believe to be the user of  
10 joe\_rose88@yahoo.com.

11           9.       The subscriber information provided by Yahoo included a Facebook user id  
12 associated with joe\_rose88@yahoo.com. An open source query of Facebook showed that  
13 id corresponded to a profile for a "Joe Grubbs." Pictures associated with this profile  
14 include photos of an individual who matches the Washington DOL photo for Joseph V.  
15 Grubbs with an address in Stanwood, Washington. In addition, "Joe Grubb's" Facebook  
16 profile shows one of his Facebook friends is an individual with the profile name J.M.

17           10.      **Further investigation with the local Stanwood Police Department**  
18 **revealed that a J.M., with an address in Stanwood, Washington, filed a complaint in**  
19 **2010 stating that he believed an acquaintance he identified as Joseph Vernon**  
20 **Grubbs was in possession of child pornography.** In the complaint, J.M. stated he had  
21 befriended Joseph Vernon Grubbs sometime in 2009 and had traveled with him to the  
22 Philippines during November 2009. He stated further that Joseph Vernon Grubbs had a  
23 girlfriend there who had a daughter that was between seven and nine years old at the  
24 time. J.M. explained that he believed Joseph Vernon Grubbs had engaged in sexual  
25 relations with the young girl while in the Philippines. J.M. also reported that the woman  
26 he employed as a housekeeper—who was Joseph Vernon Grubbs's roommate—reported  
27 to him that she saw Grubbs viewing what she believed were sexually explicit images of  
28 children on his computer.

1           11. Further investigation by FBI Seattle/Everett of the previously identified  
2 Facebook ID for "Joe Grubbs," indicates that Joe Grubbs does have access to children in  
3 the Philippines through what appears to be an adult female girlfriend. The female  
4 children in the photos appear to be of the same age as the unidentified victim. Further,  
5 there are specific indications that the locations of the photos and postings are taken and  
6 made in an area of the Philippines.

7           12. On June 17, 2016, I obtained a federal search warrant (MJ16-259) in the  
8 Western District of Washington for the content of email account joe\_rose88@yahoo.com  
9 (along with several related email accounts). Yahoo provided the requested material to the  
10 FBI following service of the warrant, and I conducted an initial review of the content of  
11 joe\_rose88@yahoo.com on June 27, 2016. Although I reviewed only a portion of the  
12 content associated with that account, I identified numerous examples of email  
13 communications in which joe\_rose88@yahoo.com was the recipient of images depicting  
14 minors engaged in sexually explicit conduct. In addition, I found chat logs documenting  
15 internet messaging conversations between joe\_rose88@yahoo.com and other users in  
16 which they discuss the sexual abuse of minors and the creation of child pornography. I  
17 describe a representative sample of the communications I have seen below.

18           13. On May 3, 2012, joe\_rose88@yahoo.com received an email from  
19 sitonrhiza@yahoo.com containing one image of an infant girl. The photo focuses on the  
20 exposed vagina of that infant, and the message includes the following text: "this one is  
21 the cutest pussy u ever see."

22           14. That same day, joe\_rose88@yahoo.com received an email from the same  
23 address containing two images of a half nude infant and seven images of an adult female,  
24 possibly the user sitonrhiza@yahoo.com, based on messenger texting coinciding with this  
25 email traffic. The infant is portrayed in these images as half nude sitting on the floor,  
26 wearing only a shirt.

27           15. On May 23, 2012, joe\_rose88@yahoo.com received an email from  
28 analiza.sexy34@yahoo.com containing twenty-five images. The images show a child

1 victim ("CV") in a variety of poses. Among other things, there are images where CV is  
 2 shown exposing her anus, vagina, and breasts to the camera. Based on her size, lack of  
 3 breast development, and lack of pubic or body hair, I believe CV is between thirteen and  
 4 sixteen years old.

5 16. On June 22, 2012, honeygerlie@rocketmail.com sent an email to  
 6 joe\_rose88@yahoo.com containing six mages. The images show a CV and an adult  
 7 female in a variety of poses, including poses where CV is exposing her anus, vagina, and  
 8 breasts to the camera. These images include a photo showing the adult female digitally  
 9 penetrating CV's vagina and CV digitally penetrating herself. Based on her size, lack of  
 10 breast development, and lack of pubic or body hair, I believe the CV is between the ages  
 11 of eight and twelve years.

12 17. On June 9, 2013, joe\_rose88@yahoo.com received an email from  
 13 edelynreyes143@yahoo.com containing fifteen images. These images show a CV posing  
 14 in a variety of positions, including poses where she is exposing her anus, vagina, and/or  
 15 breasts to the camera. Based on her size, lack of breast development, and lack of pubic or  
 16 body hair, I believe the CV is less than ten years old.

17 18. In addition to the above emails and images, I also found several Yahoo  
 18 Messenger chat logs involving joe\_rose88@yahoo.com and other users suggesting  
 19 joe\_rose88@yahoo.com was actively seeking sexual contact with minors and the  
 20 production of child pornography. Below are excerpts of some of these conversations.

21 19. Exchange between honeygerlie@rocketmail.com (HG)—who had stated  
 22 she was fifteen in an earlier message on May 18, 2012—and joe\_rose88@yahoo.com  
 23 (JR):

24 7/4/2012

25 JR "i thought you and your bf was going to let me watch you fuck?im very  
 26 interested in that sweetie"

27 7/6/2012

28 JR "i bought a ticket yesterday to pi aug 28"

1 7/7/2012

2 JR "i bought my plane ticket .im going to p i on the 28 aug"

3 JR "can we meet id love to fuck you honey"

4 7/23/2012

5 JR "im 63 and have a good pension"

6 HG "yes but yu long way from here"

7 JR "im going there on 28 aug"

8 HG "ok yu wish to meet on real on me"

9 JR "yes"

10 8/3/2012

11 JR "im coming aug 28 but i want to see you on cam first honey"

12 HG "ok i try"

13 HG "can yu pay for me"

14 HG "just for foods for my family"

15 HG "i love you joe"

16 HG "XXXXXXXXXXXX"

17 HG "i will keep yur cok hard and empty of cum"

18 8/7/2012

19 JR "hi sweetie some day we will be on at the same time"

20 JR "if you want me to send you money for food you better get online"

21 JR "my cell number is 001 425 268 3281 text me"

22 8/21/2012

23 JR "im leaving for p i in 7 days am i going to be able to meet with you?give me  
24 your cell number so i can text"

25 8/26/2012

26 JR "hello im leaving for philippines in 2 days sweetie"

27 JR "wish I have your cell number so i can text you when im there"

1 8/27/2012

2 HG "were are yu going in phil"

3 HG "me and my cousin meet yu herw i hoping"

4 HG "she 9 yrs old and skinny body with no pussy hairs"

5 HG "we both help yur cum out of yur cock hehe"

6 HG "tell me yur cell wen yu here i call yu"

7 20. There was another exchange approximately nine months later. Among  
8 other things, the user of honeygerlie@rocketmail.com stated she was thirteen (not  
9 fifteen):

10 4/7/2013

11 JR "how old are you now sweetie?have you grown any hair on your pussy yet?you  
12 was so smooth on your pussy before,i loved looking at it"

13 JR "i would love it if you could send me pics of you now.you are so pretty"

14 HG "i am 13yrs my pussy smooth yu like no hair on pussy hehe"

15 HG "i am not virgin i having experience now"

16 HG "yu have gf here now"

17 HG "she young pussy also"

18 21. Exchange between berloveslim@yahoo.com (BL) and  
19 joe\_rose88@yahoo.com (JR):

20 6/27/2012

21 BL "u can help yet babe"

22 BL "they do good hun"

23 BL "both girls"

24 BL "14 y/o and 17 y/o"

25 BL "do"

26 JR "you already owe me"

27 BL "guy"

28 BL "yes but i did erlier"



1 BL "then before"  
2 JR "you said that i have one coming yet"  
3 BL "yes erlier I do"  
4 BL "to you"  
5 BL "remember?"  
6 JR "i didn't cum and computer was stopping and i was surposed to send 20 but i  
7 sent 50"  
8 BL "but can u sent more coz i pay them 300 pesos per 1 girl then guy"  
9 7/2/2012  
10 BL "so they start now"  
11 JR "how old is she?"  
12 BL "shes 15y/o"  
13 BL "see"  
14 BL "ok they start now?"  
15 JR "yes i love her bald pussy"  
16 BL "ok"  
17 JR "shes getting me so excited i might cum 2 times"  
18 BL "its ok with u 1 time cum baby"  
19 BL "ohhhhhhhhhhhh"  
20 BL "yumyyyyyyyyyyyyyyyy"  
21 BL "love."  
22 JR "move cam a little"  
23 BL "her"  
24 BL "u like"  
25 BL "so do fuck now"  
26 JR "yes can he put cock in her for awhile"  
27 BL "ok u mean fuck?"  
28 JR "yes"

1 BL "ok"

2 7/7/ 2012

3 JR "I bourgt a ticket to p i on aug 28"

4 BL "ahh.. ok"

5 JR "how much you charge a night for one of your girls?"

6 BL "ABOUT 1300 PESOS?"

7 BL "U CAN AFORD A LITTLE LIKE THAT"

8 JR "yesw once im there i might even get 2"

9 22. Exchange between ann.roses@yahoo.com (AR) and

10 joe\_rose88@yahoo.com (JR):

11 8/5/2012

12 JR "how old are you?"

13 AR "im 15y/o"

14 JR "sweet"

15 AR ":-\*"

16 JR "can I see a real close up of your pussy"

17 AR "ok u see me"

18 AR "hmmmmmm u like it baby"

19 JR "i never fucked a pussy that young when was your first sex?"

20 23. The emails and chat logs described above represent only a fraction of the  
21 content that appears to relate to the active solicitation of material depicting the sexual  
22 exploitation of minors. The activity in this account begins as early as 2012 and continues  
23 through December 2015.

24 24. As noted above, I believe the owner and user of joe\_rose88@yahoo.com is  
25 JOSEPH VERNON GRUBBS. During my review of the Yahoo Messenger logs, I saw  
26 several messages from joe\_rose88@yahoo.com in which the user claimed to be  
27 physically located in and around Seattle and Everett. That user also provided a phone  
28

1 number that according to publicly available databases is associated with JOSEPH  
2 VERNON GRUBBS.

3 25. In addition, the user of joe\_rose88@yahoo.com sent multiple photos  
4 purporting to be that user using that email account. Those photos match both the  
5 individual pictured in the Facebook account for "Joe Grubbs" and the Washington DOL  
6 photo for JOSEPH VERNON GRUBBS.

7 26. I also conducted a search of law enforcement databases and found that  
8 JOSEPH VERNON GRUBBS has regularly travelled to the Philippines, beginning as  
9 early as 1995 and most recently returning from the Philippines in March 2016.

10 27. On July 14, 2016, I contacted J.M. at his residence in Stanwood,  
11 Washington, which was also the last known residence of JOSEPH VERNON GRUBBS.  
12 In response my questions, J.M. told me that JOSEPH VERNON GRUBBS now lives in  
13 the vicinity of 240 Maple Street, Camano Island, WA.

14 28. Another FBI agent and I went to that address on Camano Island and spoke  
15 with the occupant of the home located at that address. She confirmed that JOSEPH  
16 VERNON GRUBBS lived in an RV currently located on her property. I encountered  
17 JOSEPH VERNON GRUBBS and saw the RV he uses as a residence. I also noted that  
18 this RV has a license plate bearing 8868 UI.


19 29. Upon encountering JOSEPH VERNON GRUBBS, I identified myself as an  
20 FBI agent and asked if I could speak to him for a few moments. Among other things, he  
21 confirmed that he lives in the RV described above. JOSEPH VERNON GRUBBS further  
22 stated that he travels to the Philippines—where he maintains a second home—every year  
23 for approximately six months and that he was scheduled to return to the Philippines in  
24 September.

25 30. On July 26, 2016, I obtained a search warrant for JOSEPH VERNON  
26 GRUBB's residence. Along with a team of other law enforcement officers, I executed  
27 that warrant the following day. JOSEPH VERNON GRUBBS was present and after  
28 being advised of his *Miranda* rights, agreed to speak with me. In a recorded interview,

1 GRUBBS confirmed that he was the owner of email account joe\_rose88@yahoo.com.  
2 And although he initially denied that the contents of the account would contain images of  
3 children engaged in sexually explicit conduct, he ultimately acknowledged that he had  
4 used that address to receive child pornography.

5 31. Several digital devices were also seized during the search. However, agents  
6 were unable to conduct an adequate onsite preview of those devices with the forensic  
7 tools available in the field. Those digital devices will be taken back to FBI offices for a  
8 forensic examination.

9 32. Based on the above facts, I respectfully submit that there is probable cause  
10 to believe that JOSEPH VERNON GRUBBS did knowingly and intentionally distribute,  
11 and possess child pornography, in violation of Title 18, United States Code, Sections  
12 2252(a)(2), and 2252(a)(4)(B).

13  
14  
15   
16 Matthew Murray, Complainant  
17 Special Agent, Federal Bureau of Investigation  
18

19 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
20 presence, the Court hereby finds that there is probable cause to believe the Defendant  
21 committed the offense set forth in the Complaint.

22  
23 Dated this 27 day of July, 2016.

24  
25   
26  
27 BRIAN A. TSUCHIDA  
28 United States Magistrate Judge